

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re: Benita Bennett ) Case No. 19-15511  
Debtor. ) Chapter 13 Proceedings  
 ) Judge Arthur I. Harris

**TRUSTEE'S OBJECTION TO DEBTORS' MOTION  
TO INCUR DEBT AND PURCHASE A VEHICLE**

Now comes LAUREN A. HELBLING, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's motion to incur debt and purchase a vehicle ("the Debtor's motion"). In support of her objection the Trustee makes the following representations to the Court:

1. The Debtor has provided no documentation that any lender has approved the Debtor for the credit necessary to complete the proposed purchase, or that said lender has consented to being paid through the plan.
2. Given the recency of the filing and the proposed unsecured dividend of 0%, the Trustee will not withdraw her objection to the motion until and unless the Debtor proves that her current vehicle is unreliable.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to sustain her objection and deny the Debtor's motion for the reasons cited.

/s/ Philip D. Lamos

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## CERTIFICATE OF SERVICE

I certify that on September 12, 2019, a true and correct copy of the Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Renee Heller, on behalf of Benita R. Bennett, Debtor at [rhlegal@aol.com](mailto:rhlegal@aol.com)

/S/ Philip D. Lamos

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